

REO LAW, LLC

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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACOVETTI LAW P.C., et. al

Case No. 2:20-cv-00163-JDW

Honorable Joshua D. Wolson

Plaintiff,

v.

**JAMES EVERETT SHELTON, &
FINAL VERDICT SOLUTIONS**

Defendants.

RESPONSE IN OPPOSITION TO PLAINTIFFS' MOTION FOR EXTENSION OF TIME

Defendant James E. Shelton, individually and d/b/a Final Verdict Solutions, hereby responds in opposition to Plaintiffs' Motion for Extension of Time Pursuant to F.R.C.P. 6(b)¹.

On January 27, 2020, the Court ordered Plaintiffs to file Corporate Disclosure Statements within seven (7) days. Plaintiffs failed to comply and did not request an extension of time. On February 14, 2020, this Court entered an Order to Show Cause requiring Plaintiffs to show cause within seven (7) days why they should not be sanctioned for failing to comply with the Court's previous order. Plaintiffs still did not comply, and waited until February 24, 2020 to request an extension of time. Plaintiffs have had more than six (6) weeks to file their corporate disclosure statements

¹ The undersigned attorney does not represent Defendant Dan Boger in this matter.

since they filed their Complaint on January 9, 2020. Plaintiffs' inattentiveness to the Federal Rules of Civil Procedure, as well as this Court's Orders, is a consistent pattern.

Defendants also oppose Plaintiffs' request for leave to amend their complaint. For the reasons stated in Defendant's Motion for Judgment on the Pleadings, Plaintiffs' complaint is frivolous, vexatious, and was filed only for the purposes of harassing Mr. Shelton for prevailing in a previous lawsuit before this Court. Plaintiffs cannot now amend their complaint by right, and this Court should not grant Plaintiffs leave to amend because amendment would simply be futile and a waste of time.

WHEREFORE, Defendants oppose Plaintiffs' motion for extension of time, and request that Plaintiffs' Motion for Extension of Time be DENIED.

/s/ Bryan Anthony Reo

Dated: February 24, 2020

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Certificate of Service

I, Bryan Anthony Reo, do hereby certify and affirm that a true and accurate copy of the foregoing document was submitted to the Court's Electronic Filing System on February 24, 2020, which should serve said document upon all attorneys of record for the instant civil action:

/s/ BRYAN ANTHONY REO
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